

## USERY & ASSOCIATES

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November 15, 2024

**Via ECF**

Hon. Paul G. Gardephe, U.S.D.J.  
U.S. District Court for the Southern District of New York  
40 Foley Sq., Rm. 2104  
New York, NY 10007

Re: *Travelers Property Casualty Company of America v. Clear Blue Insurance Company*  
Case No. 1:21-cv-04721-PGG

Dear Judge Gardephe:

This office represents Plaintiff, Travelers Property Casualty Company of America, in connection with the above-referenced action. We submit this letter jointly with counsel for Defendant, Clear Blue Insurance Company, pursuant to the to the Court's Memo Endorsement dated September 20, 2024 (ECF No. 38).

Earlier today, the parties reached a settlement in principle regarding the amount of past defense fees to be reimbursed. The parties are working to reduce their settlement to writing and anticipate that this action will be dismissed voluntarily once that is complete. In light of the foregoing, the parties respectfully request that the Court allow the parties 45 days to finalize the settlement and file an appropriate stipulation of dismissal.

Your Honor's attention and consideration are appreciated.

Respectfully submitted,

/s/Lisa Szczepanski  
Lisa Szczepanski  
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Attorneys for The Travelers Indemnity Company

/s/Sherri N. Pavloff  
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*Not a Partnership or Professional Corporation. All attorneys are employees of The Travelers Indemnity Company and its Property Casualty Affiliates.*

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